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## Via ECF

Hon. Allyne R. Ross United States District Judge United States District Court 225 Cadman Plaza East Brooklyn, New York 11201

Re: <u>United States v. Abdi Yusuf Hassan</u>, (18-CR-603) (ARR)

Dear Judge Ross,

This letter is submitted, with the Government's consent, to respectfully adjourn the suppression hearing currently scheduled for April 2, 2020. As the Court is aware, New York State is now under a lockdown order due to the continuing spread of the coronavirus and legal visits to detention facilities have been suspended for the past ten days. These restrictions have made it impossible to communicate with my client, review discovery and prepare for the hearing. More importantly, given the continued and unabated spread of the virus to many of those around us, we submit that conducting the hearing on April 2, 2020 would pose the risk of exposure to all those involved in the litigation.

We understand that the Court is amenable to continuing the matter until the week of April 27, 2020 at which time the viability of conducting the hearing can be reassessed. We ask that the Court do so.

The defense consents to the exclusion of time under the Speedy Trial Act.

Respectfully Submitted,
/s/
James Kousouros, Esq.

David W. Denton, Jr. Samuel Adelsberg Assistant United States Attorneys